

## SENIOR CITIZENS FOR HUMANE LEGISLATION

4440 Colbath Avenue  
Sherman Oaks, CA 91423-3516

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September 2, 1999

Food and Drug Administration:  
FDA/Dockets Management Branch (HFA-305)

~~CONFIDENTIAL 9974~~  
5630 Fishers Lane, Rm. 1061  
Rockville, MD20852

Our organization which represents senior citizens in the state of California is interested in the strategic plan you are developing regarding food safety hazards. We are particularly concerned about the agriculture industry's pressure to exclude animals from consideration in the council's plan. Animal production is overflowing with problems for animals and ultimately these problems overflow to consumers.

The inhumane and unhygienic transport and slaughter of animals, in addition to overcrowded conditions make it extremely important that these animals be included in the study of food hazards. Some areas of concern are the excessive use of antibiotics and other drugs, chicken litter and feces in feed, and diseased animals rendered into animal feed.

Food safety hazards must first and foremost be addressed at the source with mandatory safeguards at the animal production stage. Such safeguards should include more humane and hygienic treatment and conditions for farm animals. Short of this, any food safety plan is doomed to fail. In addition, regulatory authority at the production stage, must be expanded.

Our organization has researched what is a typical example of the modern day slaughterhouses in the United States: Animals who are supposed to be stunned and rendered unconscious with stun guns and bullets move down the line fully conscious and in distress, often flailing and even falling off hooks onto the kill line injuring workers on a daily basis. Numerous employees on the kill floor shockingly admit that between thirty and fifty percent of the cows being slaughtered are fully conscious and alive as they move down the kill line. One worker shared gruesome accounts of suffering, terrified animals being regularly skinned alive at his station. In the quickly moving processing line, workers do not have time to remove pus-filled abscesses found in the fresh-killed meat whizzing down the conveyor belt. They also don't have time to sanitize slabs of meat that sometimes fall to the floor and become contaminated. This meat is not removed from the line; instead, it is packaged for sale to grocery stores and school cafeterias throughout the state. One IBP employee readily admitted to concerns about e.coli and other health hazards resulting from unsanitary conditions. Because of

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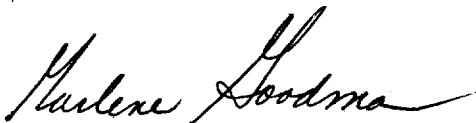
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the continual push for increased production and line speeds workers are frequently denied bathroom and lunch breaks. Women working on the line are forced to choose between urinating or taking a bathroom break and losing their job. (Source: NARN Northwest Animal Rights; Network, June , 1999)

All animals are killed indiscriminately cruelly no matter if they come from factory farms or from family farms. Are you brave enough to admit that the one natural reservoir of E. Coli 0157:H7 has been proven to be the intestinal tract of cattle ? That the avenue of infection is feces splattered on our meat? That the disease which was extremely rare only a decade ago has now become the leading cause of kidney failure in US children. That all this suffering is in direct correlation to the deregulatory programs of the last two administrations. Factory farm intensive confinement conditions result in severe physiological as well as behavioral afflictions in all farm animals. Anemia, influenza, intestinal diseases, mastitis, metritis, orthostasis, pneumonia, and scours are only the beginning of a long list of ailments. Factory farms are a breeding round for stress and infectious diseases. Medical doctors now warn that the tragedy of factory farming reaches well beyond the farm animals themselves. According to a broad spectrum of scientists, the high level of contaminants in factory farm products now poses a serious danger to human health. Studies in the New England Journal of Medicine and research by the U.S. Centers for Disease Control, National Resources Defense Council, and the FDA all warn that the levels of antibiotics and other contaminants in commercially raised meat constitute a serious threat to public health. Widespread overuse of antibiotics is resulting in the evolution of new, strains of virulent bacteria whose resistance to antibiotics poses a great threat to human health. Doctors are now reporting that, due to their uncontrolled use on factory farms, these formerly life-saving drugs are often rendered useless in combating human disease. Dr. Jere Goyan, Dean of the School of Pharmacy at the University of California, San Francisco, states that the indiscriminate use of antibiotics in animal feed is leading to a major national crisis in public health. Unless we take action now to curb the use of these drugs in the livestock industry we will not be able to use them to treat human disease.

Please help keep our families safe, we worked very hard raising them. Please respond.

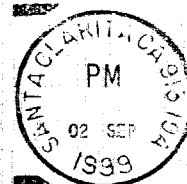
Sincerely,

A handwritten signature in cursive script that reads "Marlene Goodman". The signature is fluid and elegant, with a long, sweeping underline.

Marlene Goodman

Director

cc: USDA/FSIS Hearing Clerk  
300 12th Street, S.W.  
Room 102 Cotton Annex  
Docket No. 98-045N  
Washington, D.C., 20250-3700



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